

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

LINDA WILLIAMS SHELTON,)
)
 Plaintiff,)
)
v.) Civil Action No.: CV-06-719-WKW
)
ALL STATE FREIGHTWAYS, INC.,)
)
 Defendant.)

DEFENDANT'S EXHIBIT LIST

Comes now the defendant Allstate Freightways, Inc. and in accordance with the scheduling order of this Court, attaches hereto its listing of exhibits to be introduced as evidence at the trial of the above styled case.

1. Plaintiff's Response to Defendant's Interrogatories;
2. Photographs of the accident scene and plaintiff's and defendant's vehicles:
1 photograph of roadway, 2 photographs of defendant's tractor, and 3 photographs of plaintiff's vehicle;
3. Copy of all records produced by plaintiff in her discovery response;
4. Copy of records from Montgomery Neurosurgical Associates received pursuant to subpoena;
5. Copy of Dr. Ryan's curriculum vitae;
6. Copy of records from Dr. Melvin Russell received pursuant to subpoena;
7. Copy of records from Neurosurgery Associates of Central Alabama received pursuant to subpoena;

8. Copy of records from Tallapoosa Board of Education received pursuant to subpoena;
9. Copy of records from Center for Pain of Montgomery received pursuant to subpoena;
10. Copy of records from Blue Cross and Blue Shield of Alabama received pursuant to subpoena;
11. Any Blue Cross and Blue Shield records regarding payment of medical bills, any subrogation interests, or the write-off of any portion of any bills;
12. Copy of records from Tallassee Rehab received pursuant to subpoena;
13. Copy of records from Tallassee Community Hospital received pursuant to subpoena;
14. Copy of records from Montgomery Imaging Center received pursuant to subpoena;
15. Copy of records from Radiology Group received pursuant to subpoena;
16. Copy of records from Alfa Insurance received pursuant to subpoena;
17. Copy of records from Herron Hill Pharmacy received pursuant to subpoena;
18. Copy of records from The Apothecary received pursuant to subpoena;
19. Copy of records from Freeman Pharmacy received pursuant to subpoena;
20. Vocational report or other documents relied upon by Jane Logan with Advantage Rehab Consulting;
21. Copy of Ms. Shelton's tax returns;

22. Any document, item, or other evidence relied upon by any medical provider to support opinions given in this case;

23. Defendant reserves the right to use any document, exhibit, or other matter found through outstanding discovery;

24. Defendant reserves the right to use any document, exhibit, or other matter necessary for rebuttal and/or impeachment;

25. Defendant reserves the right to use any document, exhibit, or other matter used in any deposition taken in this case;

26. Defendant reserves the right to use any and all documents, exhibits, or other matters relied upon or used by any expert witness in this case;

27. Defendant reserves the right to offer any exhibit listed by the plaintiff;

28. Defendant reserves the right to offer any document, item, or other matter received pursuant to any subpoena issued by any party.

29. The defendant reserves the right to list additional exhibits as may be discovered and which appear to be relevant or material to the subject matter made the basis of this action.

Respectfully submitted,

s/Steven K. Herndon (HER028)
Attorney for Defendant

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of October, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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s/Steven K. Herndon (HER028)